

IN THE NORTHERN DISTRICT OF OKLAHOMA  
UNITED STATES OF AMERICA

PHILIP SANDERS, an Individual)  
and Husband and Next of Kin )  
of BRENDA JEAN SANDERS, )  
Deceased, )  
Plaintiff, )  
VS. ) Case No: 17-cv-492-JHP-FHM  
CREEK COUNTY BOARD OF COUNTY )  
COMMISSIONERS and SHERIFF )  
BRET BOWLING, in his official )  
Capacity as Creek County )  
Sheriff, and TURN KEY HEALTH )  
CLINICS, a limited liability )  
Company, )  
Defendants. )

\* \* \* \* \*

DEPOSITION OF TAMARA DAVIS

TAKEN ON BEHALF OF THE PLAINTIFF

ON THE 14TH DAY OF AUGUST, 2020,

AT THE WASHITA COUNTY COURTHOUSE

CORDELL, OKLAHOMA

\* \* \* \* \*

APPEARANCES:

Charles L. Richardson, 7447 S. Lewis Ave., Tulsa, Oklahoma  
74136, on behalf of the Plaintiff.

Paulina Thompson, 9801 N. Broadway Extension, Oklahoma City,  
Oklahoma 73114, on behalf of the Defendant Turn Key Health  
Clinic.

REPORTED BY:

Sherri L. Waldrop, CSR, RPR

12 A I don't recall other than my documentation. I would  
13 have assessed her.

14 Q At some point you would have assessed her, correct?

15 A Yes.

16 Q And that is documented --

17 A Yes.

18 Q -- in the records, correct? Would you have reviewed  
19 her medical chart at some point at that time?

20 A After -- based on my nurse's note, I wouldn't have left  
21 her side due to her blood pressure. So I --

22 Q So --

23 A I would have checked it after I sent her to the  
24 hospital.

25 Q So you stated you wouldn't have left the side of the

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1 patient until she was transported, correct?

2 A Correct.

3 Q So, since that was the only time you saw that patient,  
4 would you have known her prior history at that time?

5 A No, ma'am.

6 Q Would you have had the opportunity to take a look at  
7 her chart at that time?

8 A No, ma'am.

9 Q And, to your knowledge, is there any record in the  
10 chart regarding Ms. Sanders having diarrhea for any period  
11 of time?

12 A No, ma'am.

13 Q Do you have any reason to believe that the Turn Key  
14 chart that you've reviewed in preparation for this  
15 deposition that's also Exhibit 1 to this deposition -- do  
16 you have any reason to believe that is not Brenda Sanders'  
17 complete medical chart?

18 A No, ma'am.

19 Q You had testified earlier that you hadn't seen Brenda's  
20 complete chart. Could you clarify which chart you were  
21 referring to?

22 A Exhibit 1 is the only chart. I don't know if that's  
23 the full chart so I'm not aware -- that's the only thing  
24 I've seen.

25 Q Do you have any reason to believe that Exhibit 1 is not

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1 her complete chart from that Turn Key facility at Creek  
2 County jail?

3 A No, ma'am.

4 Q When a patient is transported out of the facility due  
5 to an emergency situation, do you have to first obtain  
6 provider's authorization?